

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

REBECCA EDWARDS,

Plaintiff,

v.

SHELBY COUNTY, TENNESSEE,
a Tennessee municipality operating as
the SHELBY COUNTY HEALTH
DEPARTMENT,

Defendant.

Case No: 2:22-cv-02682-TMP

JURY VERDICT FORM

Americans with Disabilities Act Claims

Claim 1: Failure to Accommodate

1. Has Rebecca Edwards proven by a preponderance of the evidence that she (a) suffered from asthma in September of 2021, and, if so, (b) that her asthma was a disability under the ADA?

YES

X

NO

If your answer to Question No. 1 is "YES," then proceed to Question No. 2. If your answer to Question No. 1 is "NO," then skip the next questions and proceed to Question No. 7.

2. Has Rebecca Edwards proven by a preponderance of the evidence that she made a request for a reasonable accommodation due to her asthma in September of 2021?

YES

X

NO

If your answer to Question No. 2 is "YES," then proceed to Question No. 3. If your answer to Question No. 2 is "NO," then skip the next questions and proceed to Question No. 7.



3. Has Defendant Shelby County proven by a preponderance of the evidence that Rebecca Edwards' request for accommodation due to her asthma in September of 2021 would have caused an undue hardship on the Defendant?

YES _____ NO X

If your answer to Question No. 3 is "NO," then proceed to Question No. 4. If your answer to Question No. 3 is "YES," then skip the next questions and proceed to Question No. 7.

4. Has Rebecca Edwards proven by a preponderance of the evidence that Defendant Shelby County did not provide her a reasonable accommodation for her asthma?

YES X NO _____

If your answer to Question No. 4 is "YES," then proceed to Questions No. 5 and 6. If your answer to Question No. 4 is "NO," then skip the next questions and proceed to Question No. 7.

Damages for Claim 1

5. Has Rebecca Edwards proven by a preponderance of the evidence that she suffered nominal damages due to an alleged failure to accommodate her asthma in September of 2021?

YES X NO _____

If your answer to Question No. 5 is "YES", then under the laws as given to you in these instructions, state the amount of nominal damages that should be paid to Plaintiff by Defendant Shelby County.

AMOUNT \$ 205.46

Proceed to Question 6.

6. Has Rebecca Edwards proven by a preponderance of the evidence that she suffered compensatory damages due to an alleged failure to accommodate her asthma in September of 2021?

YES X NO _____

If your answer to Question No. 6 is "YES", then under the laws as given to you in these instructions, state the amount of compensatory damages that should be paid to Plaintiff by Defendant Shelby County.

AMOUNT \$ 410.92

Proceed to Question 7.

Claim No. 2: Disability Discrimination

7. Has Rebecca Edwards proven by a preponderance of the evidence that she (a) suffered from night blindness and, if so, (b) that her night blindness was a disability under the ADA?

YES X NO _____

If your answer to Question No. 7 is "YES," then proceed to Question No. 8. If your answer to Question No. 7 is "NO," then proceed to Question No. 9.

8. Has Rebecca Edwards proven by a preponderance of the evidence that Defendant Shelby County's termination of her would not have happened but for her disability under the ADA?

YES X NO _____

Proceed to Question 9.

Claim No. 3: Unlawful Retaliation

9. Has Rebecca Edwards proven by a preponderance of the evidence that she requested a reasonable accommodation due to her night blindness?

YES X NO _____

If your answer to Question No. 9 is "YES," then proceed to Question No. 10. If your answer to Question No. 9 is "NO," the foreperson should sign the Jury Verdict Form and notify the Court Security Officer, who will deliver the Form to the Court.

10. Has Rebecca Edwards proven by a preponderance of the evidence that Defendant Shelby County's termination of her was in retaliation for her request for a reasonable accommodation.

YES X NO _____

If your answers to both Questions No. 7 and 8 were "YES", and/or if your answers to both Questions No. 9 and 10 were "YES", then proceed to Question No. 11. Otherwise, the foreperson should sign the Jury Verdict Form and notify the Court Security Officer, who will deliver the Form to the Court.

Damages for Claims 2 and 3

11. Has Rebecca Edwards proven by a preponderance of the evidence that she suffered compensatory damages because of unlawful retaliation or disability discrimination by Shelby County as defined in the jury instructions?

YES X NO _____

If your answer to Question 11 is "YES", then under the laws as given to you in these instructions, state the amount of compensatory damages that should be paid to Plaintiff by Defendant Shelby County.

AMOUNT \$ 100,000.00

Proceed to Question 12.

12. Has Rebecca Edwards proven by a preponderance of the evidence that she is entitled to back pay?

YES X NO _____

If your answer to Question 12 is "YES," then, under the laws as given to you in these instructions, proceed to Question 13.

13. If you answered "YES" to Question 12, then has Rebecca Edwards proven by preponderance of the evidence that she is entitled to back pay damages until June 30, 2022, or until the present date?

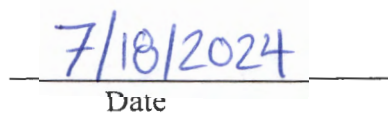
Until June 30, 2022 X Until the Present Date _____

Based upon the selected date above, please calculate the amount of back pay that should be paid to a Rebecca Edwards by Shelby County.

AMOUNT \$ 38,009.73

Once your answers are complete, the foreperson should sign the Jury Verdict Form and notify the Court Security Officer, who will deliver the Form to the Court.


FOREPERSON


Date